

**Subject:** FW: Crumb Rubber FRAP--Request for meeting

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Dear Dr. Burke,

This is to request a meeting between you and representatives of the synthetic turf industry who are greatly impacted by the Federal Research Action Plan (FRAP) being undertaken by your office as well as the CDC and the CPSC. Senior industry executives will be in Washington on August 30 and 31 and we hope that you would have a few minutes on your schedule on either of those days to hear their concerns.

To summarize, we believe the final testing protocol recently made public is critically flawed and will not accomplish the goals that government, industry and other stakeholders share—that is, to determine the health impacts of playing on playgrounds and fields with recycled rubber infill. This is because the testing protocol does not include any mechanism to control for sources of environment contamination that may be on the tested fields. In our comments we suggested that adjacent grass fields be tested to provide that control but this suggestion was not included, and indeed the purpose of the suggestion seems to have been misunderstood by those analyzing the comments and designing the protocol.

What we are hearing from EPA staff is that "sampling adjacent grass fields is beyond the scope of the FRAP." While a comparison of potential contaminants in synthetic turf fields to those found in natural grass fields/soil would be beneficial to the general public in allowing them to make informed decisions, *that is not the point of our request*. Our request is not to expand the scope of the inquiry but rather to addresses a flaw in the protocol that will affect the reliability of the results. The control sampling is necessary to provide a proper scientific basis to reasonably conclude that any potential contaminants found in the synthetic turf actually comes from the turf rather than ambient sources. For example, contaminants that may be found on the turf could emanate from nearby industrial sites or automobile exhaust. If comparable levels of a particular substance are found on both synthetic and adjacent natural fields (or soil), the substance can reasonably be attributed to ambient sources rather than the turf. It is critical that EPA address this inadequacy in its protocol. Without proper scientific controls, EPA will have no reasonable basis to conclude that what they find actually comes from the turf. If that is the case, all of this hard work will have been for naught.

While we understand that EPA intends to conduct air sampling to assess ambient sources of potential contaminants, we strongly believe that air sampling alone is not adequate. Air sampling alone does not account for wind variations or potential contaminants that may be settled on the ground. A number of scheduled field installations have been put on hold because of the federal study. Our clients report that the level of their business is down by over 10 per cent from last year and they attribute this directly to the federal study. The industry also wants answers and desires to cooperate with the government in any way they can as you undertake this important work. Nevertheless, we have strong concerns that the flaws in the testing protocol will result in an effort that raises as many questions as it answers.

I do hope that you can find time in your schedule to meet with us later in the month. I look forward to hearing from you. Thank you for your consideration.

Nancy Nord

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